

# ISHMAN LAW FIRM, P.C.

9660 FALLS OF NEUSE ROAD, SUITE 138-350  
RALEIGH, NORTH CAROLINA 27615  
mailing address

FORUM I BUILDING  
8601 SIX FORKS RD., ST. 400  
RALEIGH, NC 27615

TEL: (919) 468-3266  
FACSIMILE: (919) 882-1466  
[www.IshmanLaw.com](http://www.IshmanLaw.com) | [www.IshmanLegal.com](http://www.IshmanLegal.com)

9104 FALLS OF NEUSE ROAD  
SUITE 200  
RALEIGH, NC 27615

May 10, 2018

## Sent via Email and US Mail

Natalie Potter <NPotter@essexrichards.com>  
Jonathan Buchan <Jbuchan@essexrichards.com>  
Essex Richards, P.A.  
1701 South Blvd.  
Charlotte, NC 28203

Re: *Baronius Press, Ltd. v. Saint Benedict Press, LLC*  
United States District Court, Western District of North Carolina  
Case No. 3:16-cv-00695-GCM

Dear Ms. Potter and Mr. Buchan:

We are sending you this correspondence in follow-up to our letter that we sent to you on April 26, 2018. We sent this letter to you after our client, Baronius Press, agreed to provide additional information to TAN.

In follow-up to this cooperation by our client, Baronius Press is seeking the same cooperation from your client, TAN, provided as follows:

1. Plaintiff has not been able to obtain the 2005 and 2009 printed editions of *Fundamentals of Catholic Dogma* of TAN Books. In order to produce a comprehensive response to (i) TAN's Request at Plaintiff's Deposition and (ii) Request No. 6 to TAN's Second Set of Interrogatories and Requests for Production of Documents, Plaintiff requires copies of these printed editions. Plaintiff believes that TAN is in possession of these editions.

**Produce a copy of the 2005 and 2009 printed editions, including but not limited to, copies of the following for each edition:**

- (1) Front Cover
- (2) Title page (page iii)
- (3) Copyright Page (page iv)
- (4) Page 313
- (5) Page 475
- (6) Back Cover.

ISHMAN LAW FIRM, P.C.

MARK W. ISHMAN  
DIRECT LINE: (919) 539-7626  
MISHMAN@ISHMANLAW.COM



Saint Benedict Press, LLC aka TAN  
c/o Essex Richards, P.A.  
May 10, 2018  
Page 2

2. In our email to you on April 19, 2018, we asked if we could obtain a better copy of SBPP02187- SBPP02188 as there are some handwritten notes on those pages that are not legible. To date we have not received it.

**Provide better quality copy of SBPP02187- SBPP02188. There are some handwritten notes on those pages that are not legible and we request that you provide high quality copies that would clearly show the notes.**

3. **SBPP-00297 to SBPP-00649 and SBPP-1948 to SBPP-2167 are documents produced by TAN.** In these identified documents produced by TAN, Good Will Publishers Inc. and Saint Benedict Press LLC are both recorded as buyers of assets from Chapter 11 Trustee of TAN Books & Publishers Inc.

**Please produce all documents that identify which company (Good Will Publishers Inc. and/or Saint Benedict Press LLC) owned exactly what assets since the purchase date to date.**

We thank you in advance for your like cooperation.

With best regards,

/s/ Mark W. Ishman



Mark W. Ishman, Esq.

---

ISHMAN LAW FIRM, P.C.

MARK W. ISHMAN  
DIRECT LINE: (919) 539-7626  
MISHMAN@ISHMANLAW.COM